

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

DEC 11 2019

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CHARLES GRIFFITH MOLER,  
a/k/a "Griff"

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Case No. 5:19 CR 00040

In Violation of: 18 U.S.C. § 2252(a)(4)(B)

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about February 3, 2015, to on or about March 3, 2016, the exact dates being unknown to the Grand Jury, in the Western District of Virginia, the defendant, CHARLES GRIFFITH MOLER, did knowingly access with intent to view at least one matter which contains one or more visual depictions, namely digital image files, that were produced using materials which had been mailed and shipped and transported using any means and facility of interstate or foreign commerce, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct.

2. All in violation of Title 18, United States Code, Section 2252(a)(4)(B).

**FORFEITURE NOTICE**

3. The allegations contained in Count One of this Indictment are realleged and incorporated by reference herein for purposes of alleging forfeiture pursuant to 18 U.S.C. § 2253.

4. Upon conviction of Count One in this Indictment, the defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1),
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2), and
- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

5. The property to be forfeited to the United States includes but is not limited to the following property:

- a. All such material containing the above-described visual depictions.
- b. Compaq Laptop Computer with Serial No. CNF95135WJ.

6. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL, this 11 day of Dec 2019

/s/ Foreperson  
GRAND JURY FOREPERSON

  
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THOMAS T. CULLEN  
UNITED STATES ATTORNEY